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8
9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 MIGUEL TORRES-ALONZO,

12 Plaintiff,

13 v.

14 UNITED STATES OF AMERICA, et al.,

15 Defendant.
16

Civil No. 08cv0242-WQH (NLS)

**JOINT MOTION TO EXTEND
SERVICE DATE OF DEFENDANT'S
RESPONSIVE PLEADING**

17 COME NOW THE PARTIES, Plaintiff Miguel Torres-Alonzo, by and through counsel,
18 Gerry Singleton, and Defendant United States of America, by and through counsel, Karen P. Hewitt,
19 United States Attorney, and David B. Wallace, Assistant U.S. Attorney, and hereby jointly move the
20 Court to extend the service date of Defendant's responsive pleading. This is an action brought under the
21 Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671-80. Plaintiff seeks \$3,000,000 dollars for his
22 injuries alleged to have been caused by acts or omissions of Federal Officers. Defense counsel needs
23 additional time to investigate Plaintiff's claim in order to properly respond to the allegations in the
24 complaint.

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1 Based upon the foregoing, it is respectfully requested that the Court extend the service date to
2 file Defendant's responsive Pleading by 60-days.

3 DATED: April 24, 2008

KAREN P. HEWITT
United States Attorney

5 s/David B. Wallace
6 Assistant U. S. Attorney
7 Counsel for Defendant
E-Mail: dave.wallace@usdoj.gov

8 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
9 of the United States District Court for the Southern District of California, I certify that the content of
10 this document is acceptable to counsel for the Plaintiffs and that I have obtained authorization from
11 Terry Singleton to affix his electronic signature to this document.

12
13 DATED: April 24, 2008

/s/Gerry Singleton
14 TERRY SINGLETON
15 Attorney for Plaintiff
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

MIGUEL TORRES-ALONZO,) CIVIL NO. 08CV0242-WQH (NLS)
)
Plaintiff,) **CERTIFICATE OF SERVICE**
)
v.)
)
UNITED STATES OF AMERICA,)
)
Defendant.)
_____)

I, David B. Wallace, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of **Joint Motion to Extend Service date of Defendant's Responsive Pleading** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Gerry Singleton
SINGLETON & ASSOCIATES
1950 Fifth Avenue
Suite 200
San Diego, CA 92101

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2008.

s/David B. Wallace
DAVID B. WALLACE